

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA §

v. § CAUSE No. H-15-CR-380

JOHN BLAKE TINKLE §

UNOPPOSED MOTION TO CONTINUE SURRENDER DATE

John Tinkle requests an extension of his deadline to surrender to the USP Beaumont, which is currently set for June 6, 2017 (*see* Dkt No. 56) for 60 days so that he may finalize his affairs before surrendering and would show this Court the following:

1. On April 20, 2017, this Court sentenced John Tinkle to 48 months custody in the Bureau of Prisons. On May 11, 2017, this Court issued an Order for Tinkle to surrender to the USP Beaumont, 6200 Knauth Road, Beaumont, Texas 77705 by 2:00 p.m. on June 6, 2017.

2. Tinkle has been employed as a water well service technician since June 2015. He currently resides with his wife in a horse trailer owned by his daughter in Waller, Texas. Tinkle needs additional time to finish the plumbing and insulation on his current home. This can also be verified with Tinkle's pretrial services officer Andrew Flores.

3. Tinkle would also like to leave his current job on good terms, and is hopeful that he can work for his current employer when he is released from prison. The Court is well aware of the challenges that Tinkle will face finding employment as a convicted felon. The Court is likewise aware of the importance of employment for the sentencing goals of rehabilitation, deterrence, and providing correctional treatment in the most effective manner. Leaving his job on good terms is an important aspect of Tinkle being able to secure employment when released, whether such employment be with his current employer or with another.

4. Andrew Flores, his pretrial supervision officer, is unopposed to this request.

Tinkle respectfully requests that his surrender date be continued for at least sixty days. Tinkle further requests that the Court recommend custody in the USP Seagoville.

Respectfully submitted,

/s/ Dan Cogdell

Dan Cogdell

TBN: 04501500

402 Main St., 4th Floor

Houston, Texas 77002

Office: 713-426-2244

Facsimile: 713-426-2255

Email: dan@cogdell-law.com

CERTIFICATE OF CONFERENCE

I certify that I have discussed the foregoing motion for continuance with Assistant United States Attorney Robert Johnson, who stated that the government is unopposed.

/s/ Dan Cogdell
Dan Cogdell

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2017, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all interested parties, including the attorneys for the Government.

/s/ Dan Cogdell
Dan Cogdell